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June 10, 2024

VIA ELECTRONIC MAIL AND ECF FILING

Honorable Paul A. Engelmayer
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: *Jane Street Group LLC v. Millennium Management LLC*, 24 C 2783 (PAE),
MOTION TO SEAL AMENDED ANSWER AND COUNTERCLAIM

Dear Judge Engelmayer:

We represent Defendant Millennium Management LLC (“Millennium”) in the above-referenced action. We write to request permission to seal certain materials that potentially contain the parties’ proprietary, commercially sensitive, or trade secret information. Millennium files its Amended Answer (with Amended Affirmative Defenses) and Counterclaim in accordance with the Court’s June 3, 2024 Order granting Millennium leave to amend its affirmative defenses *sua sponte* (D.I. 95) and the Court’s prior Order granting sealing of Millennium’s Answer and Counterclaims (D.I. 75).

Millennium’s Amended Answer and Counterclaim do not contain any Millennium trade secret or confidential information. And Millennium disputes that its Amended Answer and Counterclaim contain any Jane Street trade-secret information or that Jane Street has articulated a viable trade-secret misappropriation theory. Further, Millennium disputes that any information that is publicly available should be redacted from public view.

Nonetheless, out of an abundance of caution, Millennium requests that its papers be filed under seal, in deference to the redactions in Jane Street’s Amended Complaint (D.I. 64) and Jane Street’s redactions to Millennium’s original Answer and Counterclaim (D.I. 85). Consistent with the Court’s Individual Rule 4.B.2, Millennium has filed with this motion with (1) a sealed copy of its Amended Answer and Counterclaim, (2) a sealed, highlighted copy of its Amended Answer and Counterclaim, and (3) a redacted public copy of its Amended Answer and Counterclaim. Millennium reserves the right to challenge the redactions in the Amended Complaint and to later revise the redactions to Millennium’s Amended Answer and Counterclaim.

Respectfully submitted,

/s/ Andrew J. Levander

Andrew J. Levander

cc: All Counsel of Record via ECF